

# **EXHIBIT A**

Friday, January 31, 2025 at 16:21:21 Eastern Standard Time

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**Subject:** RE: Case No. 1:24-cv-05625, Fujian Mingta Toys Co Ltd. v. The Partnerships and Unincorporated Associations Identified in Schedule "A"  
**Date:** Wednesday, January 29, 2025 at 3:43:39 PM Eastern Standard Time  
**From:** Tim Wang  
**To:** William Brees  
**CC:** Nick Najera, Litigation  
**Attachments:** image001.png

Bill,

We are not avoiding your call. As Nick already explained, our client has rescinded the agreement and declined to sign. We do oppose the motion to enforce the settlement agreement if it what your clients plan to do. There is no meet and confer requirement at NDIL for such a motion. I have presented an updated settlement demand to Amanda. If you want to stipulate to a revised asset restraint, I will present that to my client as well. China is in the weeklong New Year holiday. It will take a few more days for things to work out if possible. We have had any further instructions from our client since this past weekend.

Best,

Tim

---

**From:** William Brees <[William@bayramoglu-legal.com](mailto:William@bayramoglu-legal.com)>  
**Sent:** Wednesday, January 29, 2025 2:00 PM  
**To:** Tim Wang <[twang@nilawfirm.com](mailto:twang@nilawfirm.com)>  
**Cc:** Nick Najera <[nnajera@nilawfirm.com](mailto:nnajera@nilawfirm.com)>; Litigation <[litigation@bayramoglu-legal.com](mailto:litigation@bayramoglu-legal.com)>  
**Subject:** FW: Case No. 1:24-cv-05625, Fujian Mingta Toys Co Ltd. v. The Partnerships and Unincorporated Associations Identified in Schedule "A"

Good Afternoon Mr. Wang,

I represent two of the defendants in the above noted case, SUNTOPDIRECT and TOPBRIGHT. These defendants have already reached settlement in this matter, but the attorney on this case (Nick Najera) has refused to act upon settlement by obtaining signature from Plaintiff or releasing SUNTOPDIRECT from the case after it has already paid the settlement amount. Mr. Najera has also been avoiding my calls and emails in an apparent attempt to avoid a meet and confer related to this issue and a planned motion to enforce judgement and for attorney fees related to the enforcement of the settlement. The full thread of communications is included below for your reference.

Do you have time today to discuss this matter? I can make myself available anytime after 3:00 PM Central Time.

Sincerely,

WILLIAM "BILL"  
BREES

Attorney-at-Law

Admissions: Florida



Bayramoglu Law

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**From:** William Brees <[William@bayramoglu-legal.com](mailto:William@bayramoglu-legal.com)>

**Date:** Wednesday, January 29, 2025 at 9:36 AM

**To:** Nick Najera <[nnajera@nilawfirm.com](mailto:nnajera@nilawfirm.com)>

**Cc:** David Silver <[david@bayramoglu-legal.com](mailto:david@bayramoglu-legal.com)>, Litigation <[litigation@bayramoglu-legal.com](mailto:litigation@bayramoglu-legal.com)>

**Subject:** Re: Case No. 1:24-cv-05625, Fujian Mingta Toys Co Ltd. v. The Partnerships and Unincorporated Associations Identified in Schedule "A"

Nick,

We need to have the meet and confer today.

Our clients are willing to delay enforcement of the settlement agreement until after the holiday break if you immediately release all funds in their accounts minus a small holdback of \$[REDACTED]. It is patently unreasonable to freeze the amount of funds that are currently in their accounts regardless of your position on settlement.

Sincerely,

WILLIAM "BILL"  
BREES

Attorney-at-Law

Admissions: Florida



Bayramoglu Law

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**From:** Nick Najera <[nnajera@nilawfirm.com](mailto:nnajera@nilawfirm.com)>

**Date:** Tuesday, January 28, 2025 at 11:15 AM

**To:** William Brees <[William@bayramoglu-legal.com](mailto:William@bayramoglu-legal.com)>

**Cc:** David Silver <[david@bayramoglu-legal.com](mailto:david@bayramoglu-legal.com)>, Litigation <[litigation@bayramoglu-legal.com](mailto:litigation@bayramoglu-legal.com)>

**Subject:** Re: Case No. 1:24-cv-05625, Fujian Mingta Toys Co Ltd. v. The Partnerships and Unincorporated Associations Identified in Schedule "A"

Bill,

A meet and confer will not be effective until next week. I need to speak with my client about this matter and will not be able to speak with them until next week due to the week-long lunar new year national holiday which started today.

Best, Nick

---

**From:** William Brees <[William@bayramoglu-legal.com](mailto:William@bayramoglu-legal.com)>

**Sent:** Monday, January 27, 2025 6:37:15 PM

**To:** Nick Najera <[nnajera@nilawfirm.com](mailto:nnajera@nilawfirm.com)>

**Cc:** David Silver <[david@bayramoglu-legal.com](mailto:david@bayramoglu-legal.com)>; Litigation <[litigation@bayramoglu-legal.com](mailto:litigation@bayramoglu-legal.com)>

**Subject:** Re: Case No. 1:24-cv-05625, Fujian Mingta Toys Co Ltd. v. The Partnerships and Unincorporated Associations Identified in Schedule "A"

Hello Nick,

If your client will not abide by the settlement entered between the parties, we will be forced to seek enforcement with the court. Please let me know if you have time tomorrow for a meet and confer regarding the motion to enforce the settlement agreement. My schedule is flexible tomorrow.

Best Regards

WILLIAM "BILL"  
BREES

Attorney-at-Law

Admissions: Florida



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**From:** William Brees <[William@bayramoglu-legal.com](mailto:William@bayramoglu-legal.com)>

**Date:** Monday, January 27, 2025 at 4:02 PM

**To:** Nick Najera <[nnajera@nilawfirm.com](mailto:nnajera@nilawfirm.com)>

**Cc:** David Silver <[david@bayramoglu-legal.com](mailto:david@bayramoglu-legal.com)>, Litigation <[litigation@bayramoglu-legal.com](mailto:litigation@bayramoglu-legal.com)>

[legal.com](https://www.legal.com)>

**Subject:** Re: Case No. 1:24-cv-05625, Fujian Mingta Toys Co Ltd. v. The Partnerships and Unincorporated Associations Identified in Schedule "A"

Nick,

As of January 13 we have agreement on settlement. You approved the tracked changes in the agreement and sent back for signature. You then confirmed that signatures are just a formality. SuntopDirect has already acted in accordance with the agreement. Our clients entered into this agreement as a matter of convenience to get their stores unlocked quickly, not because the case had merit. It is unreasonable for your firm to hold the stores hostage after settlement.

WILLIAM "BILL"  
BREES

Attorney-at-Law

Admissions: Florida



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**From:** Nick Najera <[nnajera@nilawfirm.com](mailto:nnajera@nilawfirm.com)>

**Date:** Monday, January 27, 2025 at 3:15 PM

**To:** William Brees <[William@bayramoglu-legal.com](mailto:William@bayramoglu-legal.com)>

**Cc:** David Silver <[david@bayramoglu-legal.com](mailto:david@bayramoglu-legal.com)>, Litigation <[litigation@bayramoglu-legal.com](mailto:litigation@bayramoglu-legal.com)>

**Subject:** RE: Case No. 1:24-cv-05625, Fujian Mingta Toys Co Ltd. v. The Partnerships and Unincorporated Associations Identified in Schedule "A"

Bill,

My understanding is our firms are talking about this through the Chinese offices.

Best, Nick

---

**From:** William Brees <[William@bayramoglu-legal.com](mailto:William@bayramoglu-legal.com)>

**Sent:** Thursday, January 23, 2025 12:22 PM

**To:** Nick Najera <[nnajera@nilawfirm.com](mailto:nnajera@nilawfirm.com)>

**Cc:** David Silver <[david@bayramoglu-legal.com](mailto:david@bayramoglu-legal.com)>; Litigation <[litigation@bayramoglu-legal.com](mailto:litigation@bayramoglu-legal.com)>

**Subject:** Re: Case No. 1:24-cv-05625, Fujian Mingta Toys Co Ltd. v. The Partnerships and Unincorporated Associations Identified in Schedule "A"

Hello Nick,

Do you have an update on when we can expect the fully executed agreement? Our client is unable to complete payment to have their store released until the executed agreement is received.

WILLIAM "BILL"  
BREES  
Attorney-at-Law



Admissions: Florida

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**From:** William Brees <[William@bayramoglu-legal.com](mailto:William@bayramoglu-legal.com)>

**Date:** Monday, January 20, 2025 at 8:32 PM

**To:** Nick Najera <[nnajera@nilawfirm.com](mailto:nnajera@nilawfirm.com)>

**Cc:** David Silver <[david@bayramoglu-legal.com](mailto:david@bayramoglu-legal.com)>, Litigation <[litigation@bayramoglu-legal.com](mailto:litigation@bayramoglu-legal.com)>

**Subject:** Re: Case No. 1:24-cv-05625, Fujian Mingta Toys Co Ltd. v. The Partnerships and Unincorporated Associations Identified in Schedule "A"

Hello Nick,

SUNTOPDIRECT wound up paying the \$[REDACTED] amount to your IOLTA Account. Receipt attached.

TOPBRIGHT is waiting on the Settlement Agreement and wants to pay as soon as possible. Please forward the fully executed agreement when received.

Thanks,

WILLIAM "BILL"  
BREES  
Attorney-at-Law



Admissions: Florida

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**From:** Nick Najera <[nnajera@nilawfirm.com](mailto:nnajera@nilawfirm.com)>  
**Date:** Friday, January 17, 2025 at 7:30 PM  
**To:** William Brees <[William@bayramoglu-legal.com](mailto:William@bayramoglu-legal.com)>  
**Cc:** David Silver <[david@bayramoglu-legal.com](mailto:david@bayramoglu-legal.com)>, Litigation <[litigation@bayramoglu-legal.com](mailto:litigation@bayramoglu-legal.com)>  
**Subject:** Re: Case No. 1:24-cv-05625, Fujian Mingta Toys Co Ltd. v. The Partnerships and Unincorporated Associations Identified in Schedule "A"

Bill,

On second thought let me get the countersigned agreements first before you have your client send the wires. My apologies if this causes any trouble on your end. Thanks, Nick

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---

**From:** William Brees <[William@bayramoglu-legal.com](mailto:William@bayramoglu-legal.com)>  
**Sent:** Friday, January 17, 2025 4:02:17 PM  
**To:** Nick Najera <[nnajera@nilawfirm.com](mailto:nnajera@nilawfirm.com)>  
**Cc:** David Silver <[david@bayramoglu-legal.com](mailto:david@bayramoglu-legal.com)>; Litigation <[litigation@bayramoglu-legal.com](mailto:litigation@bayramoglu-legal.com)>  
**Subject:** Re: Case No. 1:24-cv-05625, Fujian Mingta Toys Co Ltd. v. The Partnerships and Unincorporated Associations Identified in Schedule "A"

Thank you.

WILLIAM "BILL"  
BREES  
Attorney-at-Law

Admissions: Florida



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**From:** Nick Najera <[nnajera@nilawfirm.com](mailto:nnajera@nilawfirm.com)>  
**Date:** Friday, January 17, 2025 at 4:17 PM  
**To:** William Brees <[William@bayramoglu-legal.com](mailto:William@bayramoglu-legal.com)>  
**Cc:** David Silver <[david@bayramoglu-legal.com](mailto:david@bayramoglu-legal.com)>, Litigation <[litigation@bayramoglu-legal.com](mailto:litigation@bayramoglu-legal.com)>  
**Subject:** RE: Case No. 1:24-cv-05625, Fujian Mingta Toys Co Ltd. v. The Partnerships and Unincorporated Associations Identified in Schedule "A"



Here is our w9

---

**From:** William Brees <[William@bayramoglu-legal.com](mailto:William@bayramoglu-legal.com)>  
**Sent:** Thursday, January 16, 2025 9:01 PM  
**To:** Nick Najera <[nnajera@nilawfirm.com](mailto:nnajera@nilawfirm.com)>  
**Cc:** David Silver <[david@bayramoglu-legal.com](mailto:david@bayramoglu-legal.com)>; Litigation <[litigation@bayramoglu-legal.com](mailto:litigation@bayramoglu-legal.com)>  
**Subject:** Re: Case No. 1:24-cv-05625, Fujian Mingta Toys Co Ltd. v. The Partnerships and Unincorporated Associations Identified in Schedule "A"

Hi Nick,

Yes, it is the TIN. It is related to a regulation of the Tax Bureau of China.

WILLIAM "BILL"  
BREES  
Attorney-at-Law

Admissions: Florida



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**From:** William Brees <[William@bayramoglu-legal.com](mailto:William@bayramoglu-legal.com)>  
**Date:** Thursday, January 16, 2025 at 9:54 PM  
**To:** Nick Najera <[nnajera@nilawfirm.com](mailto:nnajera@nilawfirm.com)>  
**Cc:** David Silver <[david@bayramoglu-legal.com](mailto:david@bayramoglu-legal.com)>, Litigation <[litigation@bayramoglu-legal.com](mailto:litigation@bayramoglu-legal.com)>  
**Subject:** Re: Case No. 1:24-cv-05625, Fujian Mingta Toys Co Ltd. v. The Partnerships and Unincorporated Associations Identified in Schedule "A"

I reached out to them for a clearer description of what they need.

WILLIAM "BILL"  
BREES  
Attorney-at-Law

Admissions: Florida



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**From:** Nick Najera <[nnajera@nilawfirm.com](mailto:nnajera@nilawfirm.com)>  
**Date:** Thursday, January 16, 2025 at 9:29 PM  
**To:** William Brees <[William@bayramoglu-legal.com](mailto:William@bayramoglu-legal.com)>  
**Cc:** David Silver <[david@bayramoglu-legal.com](mailto:david@bayramoglu-legal.com)>, Litigation <[litigation@bayramoglu-legal.com](mailto:litigation@bayramoglu-legal.com)>  
**Subject:** Re: Case No. 1:24-cv-05625, Fujian Mingta Toys Co Ltd. v. The Partnerships and Unincorporated Associations Identified in Schedule "A"

What do you mean by tax code? Do you mean our firms TIN?

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---

**From:** William Brees <[William@bayramoglu-legal.com](mailto:William@bayramoglu-legal.com)>  
**Sent:** Thursday, January 16, 2025 8:22:38 PM  
**To:** Nick Najera <[nnajera@nilawfirm.com](mailto:nnajera@nilawfirm.com)>  
**Cc:** David Silver <[david@bayramoglu-legal.com](mailto:david@bayramoglu-legal.com)>; Litigation <[litigation@bayramoglu-legal.com](mailto:litigation@bayramoglu-legal.com)>  
**Subject:** Re: Case No. 1:24-cv-05625, Fujian Mingta Toys Co Ltd. v. The Partnerships and Unincorporated Associations Identified in Schedule "A"

Hi Nick,

The clients are willing to pay before receiving the executed copies. They attempted to do so and realized they need your tax code. Can you please provide the tax code?

Thanks,

WILLIAM "BILL"  
BREES  
Attorney-at-Law

Admissions: Florida



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**From:** Nick Najera <[nnajera@nilawfirm.com](mailto:nnajera@nilawfirm.com)>  
**Date:** Thursday, January 16, 2025 at 5:04 PM  
**To:** William Brees <[William@bayramoglu-legal.com](mailto:William@bayramoglu-legal.com)>  
**Cc:** David Silver <[david@bayramoglu-legal.com](mailto:david@bayramoglu-legal.com)>, Litigation <[litigation@bayramoglu-legal.com](mailto:litigation@bayramoglu-legal.com)>  
**Subject:** RE: Case No. 1:24-cv-05625, Fujian Mingta Toys Co Ltd. v. The Partnerships and

Unincorporated Associations Identified in Schedule "A"

I just forwarded it to China for signature today. The signature is just a formality. If your client is comfortable to wire the funds, I can move forward with the dismissal once received.

Best, Nick

---

**From:** William Brees <[William@bayramoglu-legal.com](mailto:William@bayramoglu-legal.com)>

**Sent:** Thursday, January 16, 2025 3:02 PM

**To:** Nick Najera <[nnajera@nilawfirm.com](mailto:nnajera@nilawfirm.com)>

**Cc:** David Silver <[david@bayramoglu-legal.com](mailto:david@bayramoglu-legal.com)>; Litigation <[litigation@bayramoglu-legal.com](mailto:litigation@bayramoglu-legal.com)>

**Subject:** Re: Case No. 1:24-cv-05625, Fujian Mingta Toys Co Ltd. v. The Partnerships and Unincorporated Associations Identified in Schedule "A"

Good Afternoon Nick,

Please let me know when you receive the executed agreement. Our clients are anxious to make their payments and have their accounts released as quickly as they can.

Thanks,

WILLIAM "BILL"  
BREES  
Attorney-at-Law

Admissions: Florida



---

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**From:** William Brees <[William@bayramoglu-legal.com](mailto:William@bayramoglu-legal.com)>

**Date:** Tuesday, January 14, 2025 at 10:38 AM

**To:** Nick Najera <[nnajera@nilawfirm.com](mailto:nnajera@nilawfirm.com)>

**Cc:** David Silver <[david@bayramoglu-legal.com](mailto:david@bayramoglu-legal.com)>, Litigation <[litigation@bayramoglu-legal.com](mailto:litigation@bayramoglu-legal.com)>

**Subject:** Re: Case No. 1:24-cv-05625, Fujian Mingta Toys Co Ltd. v. The Partnerships and Unincorporated Associations Identified in Schedule "A"

Good Morning Nick,

Please find attached the agreements signed by our clients. Our clients are prepared to wire payment quickly after receiving the fully executed agreements.

Best Regards,

WILLIAM "BILL"  
BREES

Attorney-at-Law

Admissions: Florida



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**From:** William Brees <[William@bayramoglu-legal.com](mailto:William@bayramoglu-legal.com)>

**Date:** Monday, January 13, 2025 at 12:17 PM

**To:** Nick Najera <[nnajera@nilawfirm.com](mailto:nnajera@nilawfirm.com)>

**Cc:** David Silver <[david@bayramoglu-legal.com](mailto:david@bayramoglu-legal.com)>, Litigation <[litigation@bayramoglu-legal.com](mailto:litigation@bayramoglu-legal.com)>

**Subject:** Re: Case No. 1:24-cv-05625, Fujian Mingta Toys Co Ltd. v. The Partnerships and Unincorporated Associations Identified in Schedule "A"

Thank you.

I forwarded to the clients for signature.

WILLIAM "BILL"  
BREES

Attorney-at-Law

Admissions: Florida



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**From:** Nick Najera <[nnajera@nilawfirm.com](mailto:nnajera@nilawfirm.com)>

**Date:** Monday, January 13, 2025 at 12:03 PM

**To:** William Brees <[William@bayramoglu-legal.com](mailto:William@bayramoglu-legal.com)>

**Cc:** David Silver <[david@bayramoglu-legal.com](mailto:david@bayramoglu-legal.com)>, Litigation <[litigation@bayramoglu-legal.com](mailto:litigation@bayramoglu-legal.com)>

**Subject:** RE: Case No. 1:24-cv-05625, Fujian Mingta Toys Co Ltd. v. The Partnerships and Unincorporated Associations Identified in Schedule "A"

Bill,

I have accepted your changes. Attached are the clean copies. Please send me the wire confirmation.

Best, Nick

---

**From:** William Brees <[William@bayramoglu-legal.com](mailto:William@bayramoglu-legal.com)>

**Sent:** Thursday, January 9, 2025 8:13 AM

**To:** Nick Najera <[nnajera@nilawfirm.com](mailto:nnajera@nilawfirm.com)>

**Cc:** David Silver <[david@bayramoglu-legal.com](mailto:david@bayramoglu-legal.com)>; Litigation <[litigation@bayramoglu-legal.com](mailto:litigation@bayramoglu-legal.com)>

**Subject:** Re: Case No. 1:24-cv-05625, Fujian Mingta Toys Co Ltd. v. The Partnerships and Unincorporated Associations Identified in Schedule "A"

Good Morning Nick,

We have reviewed with the client. Please find the agreements with tracked changes attached.

Best Regards,

WILLIAM "BILL"  
BREES  
Attorney-at-Law

Admissions: Florida



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**From:** William Brees <[William@bayramoglu-legal.com](mailto:William@bayramoglu-legal.com)>

**Date:** Wednesday, January 8, 2025 at 11:50 AM

**To:** Nick Najera <[nnajera@nilawfirm.com](mailto:nnajera@nilawfirm.com)>

**Cc:** David Silver <[david@bayramoglu-legal.com](mailto:david@bayramoglu-legal.com)>, Litigation <[litigation@bayramoglu-legal.com](mailto:litigation@bayramoglu-legal.com)>

**Subject:** Re: Case No. 1:24-cv-05625, Fujian Mingta Toys Co Ltd. v. The Partnerships and Unincorporated Associations Identified in Schedule "A"

Thank you.

WILLIAM "BILL"  
BREES  
Attorney-at-Law

Admissions: Florida



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[www.bayramoglu-legal.com](http://www.bayramoglu-legal.com)

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**From:** Nick Najera <[nnajera@nilawfirm.com](mailto:nnajera@nilawfirm.com)>  
**Date:** Wednesday, January 8, 2025 at 11:39 AM  
**To:** William Brees <[William@bayramoglu-legal.com](mailto:William@bayramoglu-legal.com)>  
**Cc:** David Silver <[david@bayramoglu-legal.com](mailto:david@bayramoglu-legal.com)>, Litigation <[litigation@bayramoglu-legal.com](mailto:litigation@bayramoglu-legal.com)>  
**Subject:** RE: Case No. 1:24-cv-05625, Fujian Mingta Toys Co Ltd. v. The Partnerships and Unincorporated Associations Identified in Schedule "A"

Here are the word versions.

---

**From:** William Brees <[William@bayramoglu-legal.com](mailto:William@bayramoglu-legal.com)>  
**Sent:** Wednesday, January 8, 2025 10:27 AM  
**To:** Nick Najera <[nnajera@nilawfirm.com](mailto:nnajera@nilawfirm.com)>  
**Cc:** David Silver <[david@bayramoglu-legal.com](mailto:david@bayramoglu-legal.com)>; Litigation <[litigation@bayramoglu-legal.com](mailto:litigation@bayramoglu-legal.com)>  
**Subject:** Re: Case No. 1:24-cv-05625, Fujian Mingta Toys Co Ltd. v. The Partnerships and Unincorporated Associations Identified in Schedule "A"

Thank you,

Would you please send the agreements in Word format.  
I will review with the client and get back to you.

WILLIAM "BILL"  
BREES  
Attorney-at-Law

Admissions: Florida



1540 West Warm Springs Road, Suite 100,  
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(702) 462-5973  
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**From:** Nick Najera <[nnajera@nilawfirm.com](mailto:nnajera@nilawfirm.com)>  
**Date:** Wednesday, January 8, 2025 at 11:24 AM  
**To:** William Brees <[William@bayramoglu-legal.com](mailto:William@bayramoglu-legal.com)>  
**Cc:** David Silver <[david@bayramoglu-legal.com](mailto:david@bayramoglu-legal.com)>, Litigation <[litigation@bayramoglu-legal.com](mailto:litigation@bayramoglu-legal.com)>  
**Subject:** RE: Case No. 1:24-cv-05625, Fujian Mingta Toys Co Ltd. v. The Partnerships and Unincorporated Associations Identified in Schedule "A"

Bill, the agreements are attached. Please send me the wire confirmation.

Best, Nick

---

**From:** William Brees <[William@bayramoglu-legal.com](mailto:William@bayramoglu-legal.com)>  
**Sent:** Tuesday, January 7, 2025 5:41 PM  
**To:** Nick Najera <[nnajera@nilawfirm.com](mailto:nnajera@nilawfirm.com)>  
**Cc:** David Silver <[david@bayramoglu-legal.com](mailto:david@bayramoglu-legal.com)>; Litigation <[litigation@bayramoglu-legal.com](mailto:litigation@bayramoglu-legal.com)>  
**Subject:** Re: Case No. 1:24-cv-05625, Fujian Mingta Toys Co Ltd. v. The Partnerships and Unincorporated Associations Identified in Schedule "A"

Hi Nick.

Separate agreements would be preferred.

Thanks,

WILLIAM "BILL"  
BREES  
Attorney-at-Law

Admissions: Florida



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**From:** Nick Najera <[nnajera@nilawfirm.com](mailto:nnajera@nilawfirm.com)>  
**Date:** Tuesday, January 7, 2025 at 5:37 PM  
**To:** William Brees <[William@bayramoglu-legal.com](mailto:William@bayramoglu-legal.com)>  
**Cc:** David Silver <[david@bayramoglu-legal.com](mailto:david@bayramoglu-legal.com)>, Litigation <[litigation@bayramoglu-legal.com](mailto:litigation@bayramoglu-legal.com)>  
**Subject:** RE: Case No. 1:24-cv-05625, Fujian Mingta Toys Co Ltd. v. The Partnerships and Unincorporated Associations Identified in Schedule "A"



Bill,

Can we do one agreement here or two separate?

---

**From:** William Brees <[William@bayramoglu-legal.com](mailto:William@bayramoglu-legal.com)>  
**Sent:** Tuesday, January 7, 2025 11:05 AM  
**To:** Nick Najera <[nnajera@nilawfirm.com](mailto:nnajera@nilawfirm.com)>  
**Cc:** David Silver <[david@bayramoglu-legal.com](mailto:david@bayramoglu-legal.com)>; Litigation <[litigation@bayramoglu-legal.com](mailto:litigation@bayramoglu-legal.com)>  
**Subject:** Re: Case No. 1:24-cv-05625, Fujian Mingta Toys Co Ltd. v. The Partnerships and Unincorporated Associations Identified in Schedule "A"

Good evening Nick,

Our client's have accepted the settlement offer. Please provide a draft settlement agreement.

Best Regards,

WILLIAM "BILL"  
BREES  
Attorney-at-Law

Admissions: Florida



---

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**From:** Nick Najera <[nnajera@nilawfirm.com](mailto:nnajera@nilawfirm.com)>  
**Date:** Saturday, January 4, 2025 at 1:14 PM  
**To:** William Brees <[William@bayramoglu-legal.com](mailto:William@bayramoglu-legal.com)>  
**Cc:** David Silver <[david@bayramoglu-legal.com](mailto:david@bayramoglu-legal.com)>, Litigation <[litigation@bayramoglu-legal.com](mailto:litigation@bayramoglu-legal.com)>  
**Subject:** RE: Case No. 1:24-cv-05625, Fujian Mingta Toys Co Ltd. v. The Partnerships and Unincorporated Associations Identified in Schedule "A"

Will, can we do \$ [REDACTED] and \$ [REDACTED] for a total of \$ [REDACTED]?

---

**From:** William Brees <[William@bayramoglu-legal.com](mailto:William@bayramoglu-legal.com)>  
**Sent:** Friday, January 3, 2025 9:33 AM  
**To:** Nick Najera <[nnajera@nilawfirm.com](mailto:nnajera@nilawfirm.com)>  
**Cc:** David Silver <[david@bayramoglu-legal.com](mailto:david@bayramoglu-legal.com)>; Litigation <[litigation@bayramoglu-legal.com](mailto:litigation@bayramoglu-legal.com)>  
**Subject:** Re: Case No. 1:24-cv-05625, Fujian Mingta Toys Co Ltd. v. The Partnerships and Unincorporated Associations Identified in Schedule "A"



Good Morning Nick,

I heard back from our clients regarding the settlement offer. They are willing to increase their offers to \$[REDACTED] for TOPBRIGHT and \$[REDACTED] for SuntopDirect.

If this is not agreeable to your client, they will move forward with defending this action and opposing the motion for preliminary injunction.

Best Regards,

**WILLIAM "BILL"  
BREES**  
Attorney-at-Law

Admissions: Florida



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**From:** Nick Najera <[nnajera@nilawfirm.com](mailto:nnajera@nilawfirm.com)>

**Date:** Monday, December 30, 2024 at 4:09 PM

**To:** William Brees <[William@bayramoglu-legal.com](mailto:William@bayramoglu-legal.com)>

**Cc:** David Silver <[david@bayramoglu-legal.com](mailto:david@bayramoglu-legal.com)>, Litigation <[litigation@bayramoglu-legal.com](mailto:litigation@bayramoglu-legal.com)>

**Subject:** RE: Case No. 1:24-cv-05625, Fujian Mingta Toys Co Ltd. v. The Partnerships and Unincorporated Associations Identified in Schedule "A"

Bill,

I can do [REDACTED] here. That's the minimum my client will accept.

Thanks, Nick

---

**From:** William Brees <[William@bayramoglu-legal.com](mailto:William@bayramoglu-legal.com)>

**Sent:** Monday, December 30, 2024 7:40 AM

**To:** Nick Najera <[nnajera@nilawfirm.com](mailto:nnajera@nilawfirm.com)>

**Cc:** David Silver <[david@bayramoglu-legal.com](mailto:david@bayramoglu-legal.com)>; Litigation <[litigation@bayramoglu-legal.com](mailto:litigation@bayramoglu-legal.com)>

**Subject:** Re: Case No. 1:24-cv-05625, Fujian Mingta Toys Co Ltd. v. The Partnerships and Unincorporated Associations Identified in Schedule "A"

Good morning Nick,

Our clients are interested in settling this matter and are willing to offer the following amounts along with an agreement to no longer sell the listed products.

TOPBRIGHT: [REDACTED]  
SuntopDirect: [REDACTED]

Best regards,

WILLIAM "BILL"  
BREES  
Attorney-at-Law

Admissions: Florida



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**From:** Nick Najera <[nnajera@nilawfirm.com](mailto:nnajera@nilawfirm.com)>  
**Date:** Friday, December 27, 2024 at 11:03 AM  
**To:** William Brees <[William@bayramoglu-legal.com](mailto:William@bayramoglu-legal.com)>  
**Cc:** David Silver <[david@bayramoglu-legal.com](mailto:david@bayramoglu-legal.com)>, Litigation <[litigation@bayramoglu-legal.com](mailto:litigation@bayramoglu-legal.com)>  
**Subject:** RE: Case No. 1:24-cv-05625, Fujian Mingta Toys Co Ltd. v. The Partnerships and Unincorporated Associations Identified in Schedule "A"

Bill,

I just called the 5973 number with no answer. Give me a call back at 972-325-2220

---

**From:** William Brees <[William@bayramoglu-legal.com](mailto:William@bayramoglu-legal.com)>  
**Sent:** Thursday, December 26, 2024 10:58 AM  
**To:** Nick Najera <[nnajera@nilawfirm.com](mailto:nnajera@nilawfirm.com)>  
**Cc:** David Silver <[david@bayramoglu-legal.com](mailto:david@bayramoglu-legal.com)>; Litigation <[litigation@bayramoglu-legal.com](mailto:litigation@bayramoglu-legal.com)>  
**Subject:** Re: Case No. 1:24-cv-05625, Fujian Mingta Toys Co Ltd. v. The Partnerships and Unincorporated Associations Identified in Schedule "A"

Yes, that works for me.

Thanks

WILLIAM "BILL"  
BREES  
Attorney-at-Law

Admissions: Florida



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**From:** Nick Najera <[nnajera@nilawfirm.com](mailto:nnajera@nilawfirm.com)>

**Date:** Thursday, December 26, 2024 at 11:37 AM

**To:** William Brees <[William@bayramoglu-legal.com](mailto:William@bayramoglu-legal.com)>

**Cc:** David Silver <[david@bayramoglu-legal.com](mailto:david@bayramoglu-legal.com)>, Litigation <[litigation@bayramoglu-legal.com](mailto:litigation@bayramoglu-legal.com)>

**Subject:** Re: Case No. 1:24-cv-05625, Fujian Mingta Toys Co Ltd. v. The Partnerships and Unincorporated Associations Identified in Schedule "A"

Bill, I am traveling today back to Dallas. Can I give you a call tomorrow morning around 10 central?

Best, Nick

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---

**From:** William Brees <[William@bayramoglu-legal.com](mailto:William@bayramoglu-legal.com)>

**Sent:** Tuesday, December 24, 2024 6:51:34 AM

**To:** Nick Najera <[nnajera@nilawfirm.com](mailto:nnajera@nilawfirm.com)>

**Cc:** David Silver <[david@bayramoglu-legal.com](mailto:david@bayramoglu-legal.com)>; Litigation <[litigation@bayramoglu-legal.com](mailto:litigation@bayramoglu-legal.com)>

**Subject:** Re: Case No. 1:24-cv-05625, Fujian Mingta Toys Co Ltd. v. The Partnerships and Unincorporated Associations Identified in Schedule "A"

Yes, I'm available Thursday or Friday.

WILLIAM "BILL"  
BREES  
Attorney-at-Law

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**From:** Nick Najera <[nnajera@nilawfirm.com](mailto:nnajera@nilawfirm.com)>  
**Date:** Monday, December 23, 2024 at 10:36 PM  
**To:** William Brees <[William@bayramoglu-legal.com](mailto:William@bayramoglu-legal.com)>  
**Cc:** David Silver <[david@bayramoglu-legal.com](mailto:david@bayramoglu-legal.com)>, Litigation <[litigation@bayramoglu-legal.com](mailto:litigation@bayramoglu-legal.com)>  
**Subject:** Re: Case No. 1:24-cv-05625, Fujian Mingta Toys Co Ltd. v. The Partnerships and Unincorporated Associations Identified in Schedule "A"

Bill, I'm out tomorrow and Wednesday for Christmas. Are you free Thursday or Friday morning?

Thanks, Nick

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**From:** William Brees <[William@bayramoglu-legal.com](mailto:William@bayramoglu-legal.com)>  
**Sent:** Monday, December 23, 2024 6:54:17 PM  
**To:** Nick Najera <[nnajera@nilawfirm.com](mailto:nnajera@nilawfirm.com)>  
**Cc:** David Silver <[david@bayramoglu-legal.com](mailto:david@bayramoglu-legal.com)>; Litigation <[litigation@bayramoglu-legal.com](mailto:litigation@bayramoglu-legal.com)>  
**Subject:** Re: Case No. 1:24-cv-05625, Fujian Mingta Toys Co Ltd. v. The Partnerships and Unincorporated Associations Identified in Schedule "A"

Hello Nick,

I would like to set up a call to discuss settlement. Is there a time that would be convenient for you tomorrow?

WILLIAM "BILL"  
BREES  
Attorney-at-Law

Admissions: Florida



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**From:** Nick Najera <[nnajera@nilawfirm.com](mailto:nnajera@nilawfirm.com)>  
**Date:** Friday, December 20, 2024 at 6:17 PM  
**To:** William Brees <[William@bayramoglu-legal.com](mailto:William@bayramoglu-legal.com)>  
**Cc:** David Silver <[david@bayramoglu-legal.com](mailto:david@bayramoglu-legal.com)>, Litigation <[litigation@bayramoglu-legal.com](mailto:litigation@bayramoglu-legal.com)>

**Subject:** RE: Case No. 1:24-cv-05625, Fujian Mingta Toys Co Ltd. v. The Partnerships and Unincorporated Associations Identified in Schedule "A"

Bill,

Thanks for reaching out. Below is a dropbox link to the sealed filings.

<https://www.dropbox.com> [REDACTED]  
[REDACTED]

Let me know if you want to talk early settlement. 972-325-2220

Best,

Nicholas Najera  
NI, WANG & MASSAND, PLLC  
8140 WALNUT HILL LANE, SUITE 615  
DALLAS, TEXAS 75231  
[nnajera@nilawfirm.com](mailto:nnajera@nilawfirm.com)

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**From:** William Brees <[William@bayramoglu-legal.com](mailto:William@bayramoglu-legal.com)>  
**Sent:** Friday, December 20, 2024 5:11 PM  
**To:** Nick Najera <[nnajera@nilawfirm.com](mailto:nnajera@nilawfirm.com)>  
**Cc:** David Silver <[david@bayramoglu-legal.com](mailto:david@bayramoglu-legal.com)>; Litigation <[litigation@bayramoglu-legal.com](mailto:litigation@bayramoglu-legal.com)>  
**Subject:** Case No. 1:24-cv-05625, Fujian Mingta Toys Co Ltd. v. The Partnerships and Unincorporated Associations Identified in Schedule "A"

Good Afternoon Mr. Najera,

Our firm has been retained to represent the following two defendant stores in the above referenced matter: TOPBRIGHT and SuntopDirect. We will enter an appearance shortly.

Would you please provide the alleged infringement evidence against each of our clients, the copyright registrations with deposits, and the Design Patent Number.

Best Regards,

WILLIAM "BILL"  
BREES  
Attorney-at-Law



Admissions: Florida

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